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Attorneys for Defendants
 BOSTON EAST TYNGSBORO
 HOLDINGS LLC, d/b/a
 STONEHEDGE INN & SPA;
 BOSTON EAST INDIA HOTELS
 LLC; STONEHEDGE CELLARS LLC

17 UNITED STATES DISTRICT COURT
 18 NORTHERN DISTRICT OF CALIFORNIA

20 SMITH-ANDERSON ENTERPRISES, INC.,

21 Plaintiff,

22 vs.

23 BOSTON EAST TYNGSBORO HOLDINGS
 24 LLC, d/b/a STONEHEDGE INN & SPA;
 BOSTON EAST INDIA HOTELS LLC;
 25 STONEHEDGE CELLARS LLC; and
 BENCHMARK WINE GROUP INC.

26 Defendants.

Case No. 3:16-CV-01361-EMC

**STIPULATION AND [PROPOSED]
 ORDER TO MODIFY HEARING DATE
 ON PLAINTIFF'S MOTION FOR
 JURISDICTIONAL DISCOVERY**

27
 28 STIP. TO MODIFY HR'G DATE ON PL.'S
 MOT. FOR JURISDICTIONAL DISC. / Case
 No. 3:16-CV-01361-EMC

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1 FOR GOOD CAUSE, the parties stipulate to modify the date of hearing on Plaintiff
2 Smith-Anderson Enterprises, Inc.'s ("Smith Anderson") Motion for Leave to Conduct Expedited
3 Jurisdictional Discovery (ECF No. 31). The Court scheduled the hearing on the motion for June
4 21, 2016. Lead counsel for Boston East Tyngsboro Holdings LLC, d/b/a Stonehedge Inn & Spa,
5 Boston East India Hotels LLC, and Stonehedge Cellars LLC (the "Stonehedge Defendants"), who
6 will be handling the hearing for the Stonehedge Defendants, had a previously scheduled
7 commitment to be out of the country on a client matter on that date.

8 Counsel for Stonehedge Defendants contacted the Court's Courtroom Deputy and was
9 told that Thursday, June 30 at 1:30 p.m. is available for a hearing. The parties are available for a
10 hearing at that date and time. Accordingly, the parties respectfully request that the Court modify
11 the date of hearing on Smith-Anderson's Motion for Leave to Conduct Expedited Jurisdictional
12 Discovery to Thursday, June 30.

13 Prior to this stipulation, the parties have made the following stipulated requests for time
14 modifications, all of which have been granted by the Court: (1) extending time for Benchmark
15 Wine Group, Inc. to respond to the complaint by 10 days after the Court rules on the Stonehedge
16 Defendants' Motion to Dismiss (ECF No. 29); (2) extending time for Smith-Anderson to respond
17 to the Stonehedge Defendants' Motion to Dismiss by seven days (ECF No. 33); and (4)
18 modifying the briefing schedule on Defendants' Motion to Dismiss and Plaintiff's Motion for
19 Jurisdictional Discovery.

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Dated: June 10, 2016

Respectfully submitted,

PRETI FLAHERTY BELIVEAU &
PACHIOS, LLP

By: /s/ Benjamin S. Piper
Benjamin S. Piper

Attorneys for Defendants
BOSTON EAST TYNGSBORO HOLDINGS
LLC, d/b/a STONEHEDGE INN & SPA;
BOSTON EAST INDIA HOTELS LLC;
STONEHEDGE CELLARS LLC

Dated June 10, 2016

COPYRIGHT COUNSELORS, LLC

By: /s/ John D. Mason
John D. Mason

Attorneys for Plaintiff
SMITH-ANDERSON ENTERPRISES, INC.

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

I attest that I have obtained concurrence to file this stipulation from counsel for Plaintiff

Smith-Andersons.

Dated: June 10, 2016

Respectfully submitted,

PRETI FLAHERTY BELIVEAU &
PACHIOS, LLP

By: /s/ Benjamin S. Piper
Benjamin S. Piper

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS ORDERED that the hearing date on Smith
Anderson”) Motion for Leave to Conduct Expedited Jurisdictional Discovery shall be on
Thursday, June 30 at 1:30 p.m.

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Dated: 6/13, 2016

